UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

The Financial Oversight and Management Board for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.,

Debtors.¹

PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered)

INFORMATIVE MOTION OF CONSUL-TECH REQUESTING TO BE HEARD AT THE SEPTEMBER 16, 2020 OMNIBUS HEARING

To the Honorable United States District Court Judge Laura Taylor Swain:

Consul-Tech Caribe, Inc. ("Consul-Tech"), by and through counsel, submits this informative motion in response to the Court's *Order Regarding Procedures for September 16-17*, 2020 *Omnibus Hearing* (Dkt. No. 14202) (the "Order"), and respectfully states as follows:

1. Fernando Van Derdys of Reichard & Escalera, LLC, intends to speak on Consul-Tech's behalf in connection with its *Motion for Allowance and Payment of Administrative Expense*

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations.).

Claim [ECF No. 9845] (the "Administrative Expense Motion") and its *Reply* in support of said motion [ECF No. 14168].

- 2. Ms. Sylvia M. Arizmendi and Ms. Alana M. Vizcarrondo will listen-in to the proceedings on Consul-Tech's behalf as attorneys who have entered an appearance in the Title III proceedings.
- 3. Consul-Tech reserves its right to be heard on any matter presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of Consul-Tech.

[Signature page follows]

DATED: September 12, 2020

Respectfully submitted,

REICHARD & ESCALERA, LLC

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CERTIFICATE OF SERVICE

We hereby certify that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/Alana M. Vizcarrondo-Santana USDC-PR 301614